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12 UNITED STATES DISTRICT COURT

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14 DISTRICT OF NEVADA

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16 FRIGID RENTALS, INC.,

17 Plaintiff,

18 vs.

19 EPIC WORLDWIDE LLC.,

20 Defendant.

21 Case No. 2:21-CV-01176-JCM-VCF

22 **STIPULATION AND ORDER TO  
EXTEND DISCOVERY PLAN AND  
SCHEDULING ORDER**

23 **(Second Request)**

24 Pursuant to LR IA 6-1, LR 7-1 and LR 26-3, Plaintiff FRIGID RENTALS, INC. (“Frigid”  
25 or “Plaintiff”) and Defendant EPIC WORLDWIDE LLC (“Epic” or “Defendant”) by and through  
26 their respective undersigned counsel, stipulate to extend the dates set forth in the parties’ operative  
27 Scheduling Order (ECF No. 14) by ninety (90) days. This stipulation is the parties’ second requested  
28 extension of dates, although the first request was very minor.<sup>1</sup> In support of this second stipulation  
and request, the parties state as follows:

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1 Plaintiff initiated this litigation by filing its Complaint (ECF No. 3) on June 21, 2021 against  
 2 Defendant. Defendant filed its Answer (ECF No. 11) on August 13, 2021.

3 The parties held a FRCP 26(f) conference between their respective counsel on September 3,  
 4 2021 and, subsequently, the parties submitted a Joint Discovery Plan (ECF No. 13) pursuant to LR  
 5 26-1(b). On September 14, 2021, the Court issued the operative Scheduling Order (ECF No. 14),  
 6 adopting the stipulated Joint Discovery Plan previously submitted by the parties.

7 On September 24, 2021, Plaintiff filed the operative First Amended Complaint (ECF No.  
 8 17). Thereafter, Defendant filed its Answer to the First Amended Complaint (ECF No. 24) on  
 9 October 7, 2021.

10 On November 5, 2021, a Motion to Substitute Attorney (ECF No. 26) by Defendant, which  
 11 sought to substitute Lewis Brisbois Bisgaard & Smith LLP (“LBBS”) as counsel for Defendant in  
 12 place of Hutchison & Steffen, PLLC. The Court granted the Motion to Substitute Attorney through  
 13 its Order (ECF No. 27) dated November 8, 2021.

14 On November 11, 2021, the parties submitted a Stipulation for Extension of Time (First  
 15 Request), which was limited to extending the date for amending pleadings and adding parties  
 16 referenced in the preceding footnote. The Court subsequently granted this stipulation in its Order  
 17 (ECF No. 29) dated November 12, 2021.

18       **A. DISCOVERY COMPLETED**

19 On September 3, 2021, counsel for Plaintiff and Defendant met and participated in their  
 20 conference pursuant to FRCP 26(f). Subsequently, both parties served their respective initial  
 21 disclosures on September 17, 2021 pursuant to FRCP 26(a)(1).

22 On September 17, 2021, Plaintiff served its First Set of Requests for Production of  
 23 Documents and Tangible Things on Defendant pursuant to FRCP 34.

24 On September 17, 2021, Plaintiff served its First Set of Interrogatories on Defendant  
 25 pursuant to FRCP 33.

26 On September 17, 2021, Plaintiff served its First Set of Requests for Admission on  
 27 Defendant pursuant to FRCP 36.

28 On October 8, 2021, Defendant served its First Supplemental Disclosure Pursuant to FRCP

1 26(a)(1).

2 On October 11, 2021, Defendant served its Responses to Plaintiff's First Set of Requests for  
3 Admission.

4 On October 15, 2021, Defendant served its Responses to Plaintiff's First Set of  
5 Interrogatories.

6 On November 18, 2021, Defendant served its First Set of Requests for Production on  
7 Plaintiff pursuant to FRCP 34.

8 On November 18, 2021, Defendant served its First Set of Requests for Admission on  
9 Plaintiff pursuant to FRCP 36.

10 On November 18, 2021, Defendant served its First Set of Interrogatories on Plaintiff  
11 pursuant to FRCP 33.

12 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

13 This lawsuit is a complex commercial dispute involving competing allegations surrounding  
14 the supply of trailer decals for a large fleet of trucks operated by a third-party discount store chain  
15 based in Canada. The fact that much of the discovery required is located abroad (in Canada)  
16 complicates the discovery process. Discovery was initiated in September and the parties are still in  
17 the early stages of completing discovery.

18 The parties need to respond to the remaining written discovery that has already been served  
19 as well as disclosing the remaining documents that have been gathered and need to be produced.  
20 Since the underlying business transaction and related third parties are based in Canada, the parties  
21 anticipate that they will need to obtain significant amounts of discovery from several third-parties  
22 located in Canada.

23 The parties will need to conduct party depositions of one another's respective  
24 representatives, along with at least three or more depositions of representatives of the various third-  
25 parties based in Canada. The parties also anticipate exchanging expert discovery and taking the  
26 depositions of the parties' respective expert witnesses.

27 / / /

28 / / /

1           **C.     REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

2           Since the time that the Court issued the operative Scheduling Order (ECF No. 14), the parties  
 3 have propounded and responded to written discovery, worked successfully to resolve one discovery  
 4 dispute and are currently in the process of meeting and conferring concerning a second one. While  
 5 the parties have organized and identified underlying relevant documents, the parties anticipate a  
 6 significant volume of at least several thousand pages that will still need to be reviewed and disclosed.  
 7 The parties are in the process of reviewing and preparing these remaining documents for disclosure,  
 8 which include large numbers of electronic records. Organizing these documents in a manner which  
 9 complies with electronic discovery protocols and which facilitates their efficient use as the case  
 10 proceeds (*e.g.*, a useable organization that lends itself to responding to written discovery) has been  
 11 time-consuming.

12          The parties further anticipate that additional time will be needed for discovery in this case  
 13 based on the fact that many of the underlying third-party records and witnesses are located in  
 14 Canada. While the parties have been diligent in attempting to obtain available information through  
 15 available channels, they anticipate that the bulk of the discoverable documents and witness  
 16 testimony based in Canada will have to be obtained through formal Canadian discovery  
 17 mechanisms.

18          Plaintiff's counsel will also be engaged in a highly complex commercial trial in Dallas,  
 19 Texas during the week of December 13-17 which is very likely to take place despite the ongoing  
 20 pandemic, and anticipate spending considerable time over the ensuing several weeks preparing for  
 21 this trial. For this reason, Plaintiff's counsel has requested, and Defendant has agreed, to an  
 22 extension for Plaintiff to respond to Defendant's written discovery.

23          Finally, Defendant's recent change of counsel on November 5, 2021 has necessarily required  
 24 additional time as Defendant's new counsel, LBBS, has onboarded and reviewed records from  
 25 Defendants' prior counsel. While the parties have been diligent and cooperating with one another  
 26 as to a number of pending discovery items during this time period, they anticipate that additional  
 27 time will be needed in light of the transition of counsel for Defendant.

28          ///

1           In light of the above, the parties respectfully submit that the above factors provide good  
 2 cause for the requested discovery plan modification detailed in the next section.

3

4           **D. PROPOSED SCHEDULE**

5 <b>EVENT</b>	6 <b>CURRENT DEADLINE</b>	7 <b>PROPOSED NEW DATE</b>
8           Amend Pleadings/Add Parties	9           November 24, 2021 <sup>2</sup>	10 <b>No change requested.</b>
11         Initial Expert Disclosures <sup>3</sup>	12         December 10, 2021	13 <b>Thursday March 31, 2022</b>
14         Rebuttal Expert Disclosures	15         January 10, 2022	16 <b>Friday April 29, 2022</b>
17         Any Motion to modify or extend the 18         Discovery Plan and Scheduling Order 19         is due under LR 26-3	20         January 19, 2022	21 <b>Tuesday May 10, 2022</b>
22         Close of Discovery	23         February 9, 2022	24 <b>Tuesday May 31, 2022</b>
25         Dispositive Motions	26         March 11, 2022	27 <b>Thursday June 30, 2022</b>
28         Pre-Trial Order	29         April 11, 2022	30 <b>Friday July 29, 2022</b>

31           If dispositive motions are filed, the deadline  
32           for filing the joint pretrial order will be suspended until 30 days after  
33           decision on the dispositive motions or further court order.

34           This second request for an extension of time is not sought for delay or any other improper  
 35 purpose. Rather, the parties seek this extension solely to allow sufficient time to complete discovery  
 36 and prepare their respective cases for trial. The parties stipulate and submit that the reasons set forth  
 37 above constitute good cause for the extension.

38           ///

39           <sup>2</sup> This deadline was previously extended as a result of the parties' Stipulation for Extension of  
 40 Time (First Request) (ECF No. 28), which the Court subsequently granted in its Order (ECF No.  
 41 29) dated November 12, 2021. No further extension is being sought as to this deadline.

42           <sup>3</sup> The parties prior Joint Discovery Plan (ECF No. 13) inadvertently included a deadline for an  
 43 Interim Status Report pursuant to the prior version of LR 26-3. Since the current operative version  
 44 of LR 26-3 no longer requires interim status reports, the parties have removed this deadline from  
 45 the proposed schedule.

1       Accordingly, the parties respectfully request that this Court extend the operative  
2 discovery plan and scheduling order by three months and three weeks (111 days) as indicated in  
3 the above table.

4       DATED this 18<sup>th</sup> day of November, 2021.

5       LEWIS BRISBOIS BISGAARD &  
6       SMITH LLP

7       \_\_\_\_\_  
8       /s/ Adam J. Pernsteiner

9       Adam J. Pernsteiner  
10      Nevada Bar No. 7862  
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12      Las Vegas, Nevada 89118

13      *Attorneys for EPIC WORLDWIDE LLC,*

14       DATED this 18<sup>th</sup> day of November, 2021.

15       SBAITI & COMPANY PLLC

16       \_\_\_\_\_  
17       /s/ Michał Zapendowski

18       Michał Zapendowski, Esq.  
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29      *Attorneys for FRIGID RENTALS, INC.*

30       \_\_\_\_\_  
31       ORDER

32       IT IS SO ORDERED:



33       \_\_\_\_\_  
34       UNITED STATES MAGISTRATE JUDGE

35       DATED: 11-23-2021